

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES GOLBERT, COOK COUNTY PUBLIC	)	
GUARDIAN, ET AL.,	)	Case No. 1:23-cv-00300
	)	
Plaintiff,	)	
v.	)	
MARC D. SMITH, ET AL.,	)	Honorable Martha M. Pacold
	)	Magistrate Judge Gabriel A. Fuentes
Defendants.	)	

**UNOPPOSED MOTION FOR ENTRY OF  
AGREED CONFIDENTIALITY AND PROTECTIVE ORDER**

NOW COME the Defendants, Marc D. Smith, et al., by their attorney, Kwame Raoul, Illinois Attorney General, and move this Court for entry of an Agreed Confidentiality and Protective Order. In support thereof, Defendants state as follows:

1. A protective order is necessary in this case to preserve confidentiality of sensitive information concerning youth in the care and custody of DCFS. Specifically, a protective order is necessary to maintain the confidentiality of information to be produced pursuant to the Agreed Order for Partial Stay of Discovery, that stays discovery except that “Defendant DCFS will provide Plaintiffs’ counsel with the names and last known addresses of Release Upon Request (“RUR”) youth who were held RUR for 7 days or more from January 2018 to January 19, 2023, as alleged in Plaintiffs’ complaint.” (Doc. 37).

2. A proposed Agreed Confidentiality and Protective Order is attached hereto as Exhibit A. This proposed Agreed Confidentiality and Protective Order has been reviewed by and agreed to by all parties.

3. The proposed Agreed Confidentiality and Protective Order has been submitted in accordance with the procedures for submitting a proposed order for electronic entry by the Court.

4. Plaintiffs do not oppose this motion.

WHEREFORE, Defendants request that this Honorable Court enter the attached proposed Agreed Confidentiality and Protective Order.

Dated: September 5, 2023

Respectfully submitted,

Barbara L. Greenspan  
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KWAME RAOUL  
Illinois Attorney General

By: s/Barbara L. Greenspan  
Barbara L. Greenspan

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that, on September 5, 2023, she caused to be filed through the Court's CM/ECF system a copy of Unopposed Motion for Entry of Agreed Confidentiality and Protective Order. Parties of record may obtain a copy of this filing through the Court's CM/ECF system.

/s/ Barbara L. Greenspan  
Barbara L. Greenspan